

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

|                          |   |                         |
|--------------------------|---|-------------------------|
| RE: GEORGE H KOURIABALIS | ) | Case No. 25 B 07839     |
|                          | ) |                         |
|                          | ) | Chapter 13              |
| Debtor(s)                | ) |                         |
|                          | ) | Judge: TIMOTHY A BARNES |

**TRUSTEE’S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for July 10, 2025 10:30 am, for the following:

Debtor has failed to provide copies to the Trustee of the most recently filed tax returns in accordance with 11 U.S.C. §§ 521(e)(2)(A)(i), and 1325(a)(1).

Debtor has failed to properly fill out schedules in accordance with 11 U.S.C. §§ 521(a)(1)(B)(i). Debtor to amend schedule I and Form 122C-1 for the correct employer information and monthly income.

The Trustee requests documentation of both Debtor and non-filing spouse's income for the six-month period preceding this case, and evidence of non-filing spouse's monthly credit card expenses. The disposable income analysis under 11 U.S.C. § 1325(b) cannot be completed until this is resolved.

Debtor shall tender any non-exempt funds received from his claim/lawsuit to the Trustee. Said proceeds shall be added to the total amount which must be paid by Debtor to Trustee pursuant to Parts 2.4, or 8.1 of the plan in order for the plan to be completed.

**WHEREFORE**, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: June 23, 2025

/s/ Thomas H. Hooper  
Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe., Suite 3850  
Chicago, IL 60603  
(312) 294-5900

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**CERTIFICATE OF SERVICE**

I, Besira Nikolla, a non-attorney, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

WONAIIS LAW LLC  
*Attorney for Debtor*

(via CM/ECF)

Adam G. Brief  
Acting United States Trustee

(via CM/ECF)

GEORGE H KOURIABALIS  
1032 BETTE LN  
GLENVIEW, IL 60025  
*debtor*

(via First Class Mail)

Dated: June 23, 2025

/s/ Besira Nikolla

Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900